



DIMEO GROUP HOLDINGS PTY LTD

Modern Slavery Statement

OCTOBER 2020

For the Australian Commonwealth *Modern Slavery Act 2018*

FY2019-2020 reporting period.

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Reporting Entity: Dimeo Group Holdings Pty Ltd

Australian Business Number: 44 630 189 758

Registered Address: Unit 4, 37 O’Riordan St,
ALEXANDRIA, NSW 2015
AUSTRALIA

Website: www.dimeo.com.au

Dimeo Cleaning Services was established in 1980. We are a privately-owned Australian cleaning company committed to providing the highest quality cleaning services across Australia.

1. Approach and approval



Dimeo Group Holdings Pty Ltd (Dimeo), is pleased to produce this Modern Slavery Statement for FY2019-2020, in accordance with the requirements of the Australian Commonwealth *Modern Slavery Act 2018*.

Dimeo is proud to be a leader in responsible employment practices and operations in the Australian cleaning industry. Since our formation in 1980, **we consistently demonstrate the highest employment standards, and advocate across the sector for positive change in fair and ethical arrangements for cleaning contracts.** We take pride in enriching the lives of our employees by providing equitable recruitment, security of employment, fair remuneration, freedom of association and opportunity for career development in respectful and supportive team environments.

In January 2020, the coronavirus pandemic (COVID-19) emerged in Australia. Throughout this period, Dimeo has worked hard to uphold the highest employment standards for our employees and maintain transparent supply chain relationships. We remain alert to the risk that COVID-19 can potentially increase the vulnerability of our employees and our supply chains' workers to Modern Slavery.

Notwithstanding Dimeo's efforts, we acknowledge that the cleaning industry is considered as a sector that has the potential to pose significant Modern Slavery risks. We are committed to continuing to work with our employees, suppliers, clients and stakeholders to eliminate potential Modern Slavery risks in our operations, supply chains and the wider Australian cleaning industry.

APPROVAL

On 20th October 2020, Dimeo's Modern Slavery Statement for FY2019-2020 was approved by the Board, acting as the principal governing body of Dimeo Group Holdings Pty Ltd ABN 44630189758, trading as Dimeo Cleaning Services.

Signed for, and as a Director of, Dimeo Group Holdings Pty Ltd,

James Webber - Director

1. Approach

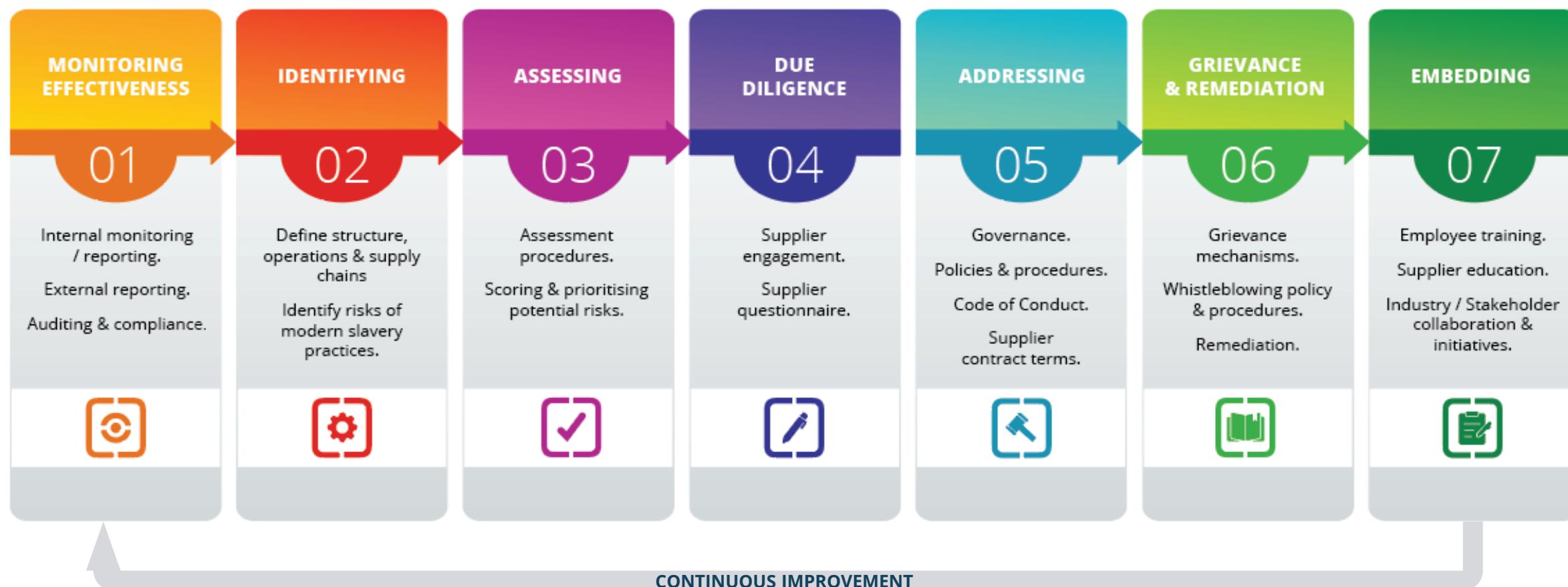


Dimeo acknowledges that we have a responsibility under the UN Guiding Principles on Business & Human Rights (UN Guiding Principles) to respect human rights in all our business activities. This responsibility includes taking action to prevent, mitigate and, where appropriate, remedy Modern Slavery in our operations and supply chains.

Dimeo has adopted a comprehensive and iterative approach to Modern Slavery risks in our operations and supply chains. In FY2019-2020 we partnered with independent consultants to enhance our existing operational and supply chain practices through the incorporation of Modern Slavery considerations.

Modern Slavery considerations are now embedded in our operations, with focus on continuous improvement.

Dimeo's approach to eliminating modern slavery risks





DIMEO'S STRUCTURE

Dimeo Group Holdings Pty Ltd, ABN 44630189758, trading as Dimeo Cleaning Services, is a privately-owned Australian company registered in Alexandria, NSW, Australia. Dimeo Group Holdings Pty Ltd owns and controls several other entities for administrative, financial and employment purposes.



Dimeo Cleaning Services Pty Ltd is the head operating entity, which enters into head contracts with Dimeo clients. Dimeo Cleaning Services Pty Ltd issues head contract invoices and receives head contract payments on behalf of all other Dimeo owned entities.

Dimeo Management Services Pty Ltd is Dimeo's supplier entity, which enters into contracts with Dimeo suppliers and contractors. It is responsible for payments to Dimeo suppliers and contractors.

All other Dimeo entities exist as administrative employment entities in various states and territories of Australia. These entities directly employ Dimeo employees, ensuring that the relevant awards and Enterprise Bargaining Agreements (EBAs) are appropriately administered.

All Dimeo entities adhere to and utilise the same organisation-wide policies, procedures and systems. These include the Dimeo Modern Slavery Policy, Contractor Engagement Policy, Dimeo Speak Up (Whistleblowing) Policy, Grievance & Complaints Policy, Dimeo Employee Code of Conduct and the Dimeo Supplier Code of Conduct, which are all publicly available via [Dimeo's website](#).

2. Structure, operations & supply chains



DIMEO'S OPERATIONS

Dimeo is a trusted, premium-level provider of professional cleaning services in Australia. Our head office is located in Sydney, with operations in metropolitan, regional and country locations across the country. Dimeo has the broadest technical expertise in the sector, servicing government, high security, forensic, commercial office, industrial, branch, retail and education assets.

Dimeo's clients include eminent organisations such as the Australian Government, State and Territory Governments, ASX100 companies and Australia's leading property owners, managers and tenants.

In FY2019-2020 Dimeo provided professional cleaning services at over 2,000 sites across Australia, equating to circa 7,000,000m² of floor space being cleaned every day. Dimeo directly employs more than 4,000 people utilising the highest responsible employment practices. We are extremely proud of the diversity of our workforce, with over 85% of Dimeo employees being of culturally and linguistically diverse backgrounds, and around 45% of our employees identifying as women.

Dimeo's supply chain is built on long-term relationships with reputable Australian based businesses. Our service providers comprise specialist cleaning and waste contractors, and our suppliers provide us with a range of cleaning products & equipment, detailed overleaf.

Dimeo utilises a unique proprietary framework for delivering excellence in our cleaning services operations. We are certified to Quality Management System ISO9001, Environment Management System ISO14001 and Occupational Health & Safety AS/NZS 4801 Standards, with annual independent audits.

COVID-19 brought some changes to Dimeo's usual operations and supply chain. Early in the pandemic we experienced increased demand for our cleaning services, followed by a decrease in demand as many clients minimised usage of their offices / premises. The Australian shortage in cleaning supplies, washroom products and personal protective equipment meant that we sourced some products from new suppliers. At the time of writing this Statement, Dimeo's operations have stabilised, with most of our employees retaining stable employment, and a return to our trusted, predominately Australian supply chain. We remain alert to the risk that COVID-19 could increase the vulnerability of our employees and workers in our supply chains to Modern Slavery.

2. Structure, operations & supply chains



OVERVIEW OF DIMEO'S OPERATIONS

- ✓ Australian Owned.
- ✓ Privately-owned professional cleaning company.
- ✓ National footprint.
- ✓ 40-year track record with blue chip client base.
- ✓ Over 4,000 employees.
- ✓ Over 2,000 sites serviced.
- ✓ Circa 7,000,000 m² floor space cleaned every night.
- ✓ Turnover of \$175m+.



SNAPSHOT OF SOME OF OUR CLIENTS





DIMEO'S SUPPLY CHAINS

Dimeo's supply chain is built on long-term relationships with reputable Australian based businesses. Dimeo has approximately 200 entities that are direct Tier 1 suppliers of products and services to our business. Of these, **the top 25 suppliers comprise 85% of Dimeo's supplier spend**. Dimeo's supplier list is available for perusal upon request.

SUPPLIERS - PRODUCTS All suppliers are located in Australia.	Main types of Products provided to Dimeo	Main Source Countries
Cleaning Supplies	✔ Sprays, fluids, detergents, disposable gloves, rubbish bags, cloths, spray bottles, mops, brooms, buckets, trolleys, bins.	Australia, China.
Uniforms & Personal Protective Equipment	✔ Shirts, name badges, trousers, hats. ✔ Hi-vis vests, eyewear, boots, masks, reusable gloves, overalls.	Australia, China.
Equipment & Plant	✔ Vacuum cleaners, floor scrubbers, floor sweepers.	China, Germany, USA.
Vehicles	✔ Cars, motorised carts.	Australia, USA, Korea, Japan.
Washroom Supplies	✔ Paper towel, toilet paper, soap, sanitiser, cloth hand towels.	Australia, China.
IT / Electronic Devices	✔ Computers, tablets, smartphones, radios / pagers.	USA, China.
Office Supplies	✔ Furniture, stationery, catering.	Australia, China.

SUPPLIERS - SERVICES All suppliers are located in Australia.	Main types of Services provided to Dimeo
Equipment Hire	✔ Plant and equipment hire companies provide short-term hire of items for specialist cleaning tasks.
Equipment Maintenance & Repairs	✔ Periodic maintenance and repairs of Dimeo owned plant and equipment.
General Cleaning Services	✔ Dimeo engaged cleaning sub-contractors where direct employment of frontline staff by Dimeo is not possible.
General Waste Collection & Disposal	✔ Bulk waste collection and disposal.
Linen Services	✔ Linen laundry services.
Professional Business Services	✔ Auditing, Finance, HR, Legal, Marketing, Software development, Consultants, & Travel.
Sanitary Waste Collection & Disposal	✔ Feminine hygiene, biohazard waste, sharps disposal.
Technical Window Cleaning	✔ Specialist technical window cleaning, usually at height.

3. Risks of Modern Slavery practices



Dimeo acknowledges that every entity has potential Modern Slavery risks in its operations and supply chains and that every entity has the potential to 'cause', 'contribute to', or be 'directly linked to' Modern Slavery, as defined by the UN Guiding Principles.

Dimeo is committed to progressively eliminating Modern Slavery risks in our operations and supply chains, by working together with our employees, suppliers, clients & stakeholders.

In FY2019-2020 Dimeo, undertook a scoping exercise to examine areas in our operations and supply chains that may involve risks of Modern Slavery practices. By considering geographic risks, sector / industry risk, product / services risks and entity risks, we developed a sound understating of areas in Dimeo's operations and supply chains that may involve risks of Modern Slavery.

Further in-depth assessment and prioritisation of risk areas is detailed in Section 4 of our Modern Slavery Statement.

<p>01</p> <p>✓ Geography Risks: Some countries may have higher risks of Modern Slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.</p>	<p>02</p> <p>✓ Sector or Industry Risks: Certain sectors and industries may have high Modern Slavery risks because of their characteristics, products and processes.</p>
<p>03</p> <p>✓ Product or Services Risks: Certain products and services may have high Modern Slavery risks because of the way they are provided or used.</p>	<p>04</p> <p>✓ Entity Risks: Some entities may have particular Modern Slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.</p>

3. Risks of Modern Slavery practices



DIMEO'S OPERATIONS

Dimeo acknowledges that the cleaning services sector is viewed as one that has potentially high risks of Modern Slavery practices. Therefore, this year, we focused our efforts on identifying potential areas of Modern Slavery risk in our own operations.

This approach has enabled Dimeo to:

- a. Implement the best possible processes for identifying, assessing, addressing and monitoring Modern Slavery risks in our own operations.
- b. Demonstrate to our current and future clients, and our broader stakeholders, that we are a committed and responsible cleaning business, focused on continuous improvement in eliminating risks of Modern Slavery practices in our operations.

Initial Scoping: Dimeo's Operations	Level of Modern Slavery Risk	Dimeo's Connection to Potential Modern Slavery Risk (Cause / Contribute / Linked)
Geography Risks		
Dimeo Operations Australia	Low potential	Cause
Sector or Industry Risks		
Cleaning Services	High potential	Cause
Product or Services Risks		
Cleaning Services	High potential	Cause
Entity Risks		
Dimeo Cleaning Services Reporting entity and the entities Dimeo owns and controls	Low potential	Cause

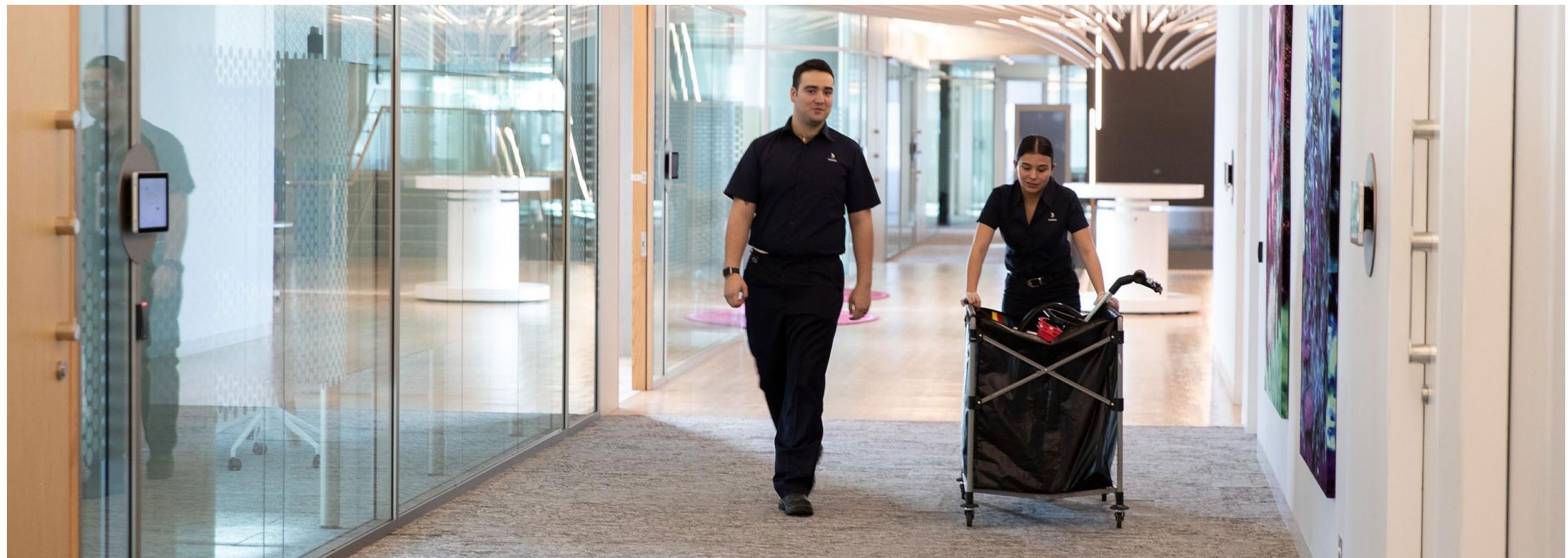
3. Risks of Modern Slavery practices



DIMEO'S SUPPLY CHAINS

In addition to closely examining our own operations, we also examined Dimeo's suppliers of products and services to identify potential risks of Modern Slavery practices in our supply chain. In FY2019-2020 we focused on the examination of our direct Tier 1 suppliers. Further in-depth assessment and due diligence related to our suppliers is detailed in Section 4.

In FY2019-2020 Dimeo had planned to also examine our key Tier 2 suppliers of products and services, to identify potential risks of Modern Slavery practices in our extended supply chain. However due to the disruption caused by COVID-19, we were unable to undertake this. Plans are now in place for this activity to take place in FY2020-2021, as outlined in Section 7.



3. Risks of Modern Slavery practices



DIMEO'S SUPPLY CHAIN – PRODUCTS

Initial Scoping: Dimeo's Supply Chain - Products	Level of Modern Slavery Risk	Dimeo's Connection to Potential Modern Slavery Risk (Cause / Contribute / Linked)
Geography Risks		
Tier 1 Suppliers – Products • Australia	Low potential	Contribute or Linked
Tier 2 & below Suppliers - Products • Australia • Germany • USA • China • Others not yet identified	Low to high potential	Linked
Sector or Industry Risks		
Tier 1 Suppliers – Products • Retail & Wholesale Trade • Warehousing & Logistics • Manufacturing	Low to high potential	Contribute or Linked
Tier 2 & below Suppliers - Products • Manufacturing • Textiles • Retail & Wholesale Trade • Warehousing & Logistics	Low to high potential	Linked
Product or Services Risks		
Tier 1, 2 & Below Suppliers - Products		
• Cleaning Supplies	High potential	Linked
• Uniforms & Personal Protective Equipment	High potential	Linked
• Equipment & Plant	High potential	Linked
• Vehicles	High potential	Linked
• Washroom Supplies	High potential	Linked
• IT / Electronic Devices	High potential	Linked
• Office Supplies	High potential	Linked
Entity Risks		
Tier 1 Suppliers - Products • Reputable Australian suppliers of products	Low potential	Contribute or Linked
Tier 2 & below Suppliers – Products • Australian and overseas suppliers	Low to high potential	Linked

3. Risks of Modern Slavery practices



DIMEO'S SUPPLY CHAINS – SERVICES

Initial Scoping: Dimeo's Supply Chain - Services	Level of Modern Slavery Risk	Dimeo's Connection to Potential Modern Slavery Risk (Cause / Contribute / Linked)
Geography Risks		
Tier 1 Suppliers - Services • Australia	Low potential	Contribute or Linked
Tier 2 & below Suppliers - Services • Australia • Germany • USA • China • India • others not yet identified	Low to high potential	Linked
Sector or Industry Risks		
Tier 1 Suppliers – Services • Cleaning Services • Waste Services • Warehousing & Logistics • Professional Services • Software Development • Retail & Wholesale Trade	Low to high potential	Contribute or Linked
Product or Services Risks		
Tier 1, 2 & Below Suppliers - Services		
• Equipment Hire	Low potential	Contribute or Linked
• Equipment Maintenance & Repairs	Low potential	Contribute or Linked
• General Cleaning Services	High potential	Contribute or Linked
• General Waste Collection & Disposal	High potential	Contribute or Linked
• Linen Services	High potential	Contribute or Linked
• Professional Business Services	Low potential	Contribute or Linked
• Sanitary Waste Collection & Disposal	High potential	Contribute or Linked
• Technical Window Cleaning	Low potential	Contribute or Linked
Entity Risks		
Tier 1 Suppliers - Services • Reputable Australian suppliers of products and services	Low potential	Contribute
Tier 2 & below Suppliers – Services • Australian and overseas suppliers	Low to high potential	Linked

Actions taken to assess & address risks, including due diligence & remediation processes



ACTIONS DIMEO TAKES TO ASSESS RISKS

Dimeo has developed the Dimeo Modern Slavery Risk Assessment Procedure, a systematic process for assessing Modern Slavery risks in our operations and supply chains. Adapted from the [Minderoo Foundation's Walk Free Modern Slavery Risk Screening Tool](#), our Modern Slavery Risk Assessment Procedure provides us with a step-by-step method for looking into our operations and supply chains for potential Modern Slavery risks.

Dimeo Risk Assessment Procedure	Assessing
1. Identify all Dimeo data sources	finance, accounts, contracts, itemised invoices, expenses.
2. Categorise data	including supplier by name, product and / or service type, total spend, company location (country of registration).
3. Sort data	by sector / industry, product / service type, company location/geography, total spend.
4. Calculate 'high spend'	suppliers with total spend greater than or equal to 5% of Dimeo's total yearly spend.
5. Research entity risk	of the 'high spend' suppliers, conduct initial high-level check of media / reputation.
6. Consider Dimeo's influence	of the 'high spend' suppliers, estimate proportion of supplier's turnover that Dimeo's contract represents.
7. Adherence to Dimeo approach	adherence to Dimeo's actions to address Modern Slavery risks, e.g. Dimeo Supplier Code of Conduct, Dimeo supplier contract.
8. Due diligence	initial high-level check of a supplier's Modern Slavery policies, procedures, management processes and reputation.

ASSESSING RISKS - SCORING & PRIORITISING

Integrated into Dimeo's Modern Slavery Risk Assessment Procedure is a scoring system. The scoring system allocates higher scores to higher risk elements and lower scores to lower risk elements. A score card including relative risk weightings is utilised to calculate an overall score and risk status for each of Dimeo's suppliers. This approach provides us with a priority list of suppliers that require more in-depth assessment and due diligence.

In FY2019-2020 Dimeo focused our efforts on our priority list of direct Tier 1 suppliers. Dimeo had planned to extend this risk assessment procedure to key Tier 2 suppliers, however due to the disruption caused by COVID-19, we were unable to undertake this. Plans are now in place for this activity to take place in FY2020-2021, as outlined in Section 7.

Actions taken to assess & address risks, including due diligence & remediation processes



DUE DILIGENCE - SUPPLIER ENGAGEMENT

In FY2019-2020 Dimeo commenced a program of communication and engagement with our supply chain to inform them about Dimeo's commitment to progressively eliminating Modern Slavery risks in our operations and supply chains. We communicated via letter and email with all our direct Tier 1 suppliers of products and services, advising them of:

- ✓ Dimeo's approach to eliminating Modern Slavery risks.
- ✓ Dimeo's revised and enhanced Modern Slavery Policy.
- ✓ Dimeo's updated policies, procedures, Supplier Code of Conduct and Contractor Agreement, all including Modern Slavery.
- ✓ Dimeo's Speak Up (Whistleblowing) Policy & procedures, applying to our suppliers, contractors and their employees.
- ✓ That some suppliers would be required to complete a Dimeo Modern Slavery Questionnaire.
- ✓ Encouraged all suppliers to complete the industry-wide Property Council of Australia Modern Slavery Assessment.
- ✓ Inviting suppliers to contact us with concerns, for guidance or additional information relating to Modern Slavery.

DUE DILIGENCE - SUPPLIER QUESTIONNAIRE – DIMEO & INDUSTRY WIDE

In addition to our supply chain communications, we specifically asked our high priority Tier 1 suppliers to complete our Dimeo Modern Slavery Questionnaire, modelled on the Property Council of Australia's (PCA) Modern Slavery Assessment questionnaire. In 2019, Dimeo contributed feedback on the initial version of the PCA Modern Slavery Assessment, and we were one of the first companies to register for and complete the Assessment. Dimeo see great value in supporting the expansion of this industry initiative and our communication with all Tier 1 suppliers specifically encourages them to register for and complete the PCA Modern Slavery Assessment.

Our Dimeo Modern Slavery Questionnaire for our suppliers comprises fifteen simple but informative questions. Our suppliers' responses have provided important information for our due diligence, helping us to identify and prioritise where in our supply chain potential Modern Slavery risks might exist and need to be addressed.

In FY2019-2020 we had planned to extend the Dimeo Modern Slavery Questionnaire to all our Tier 1 suppliers and to high priority Tier 2 suppliers. However due to the disruption caused by COVID-19, we were unable to undertake this. Plans are now in place for this activity to take place in FY2020-2021, as outlined in Section 7.

Actions taken to assess & address risks, including due diligence & remediation processes



ACTIONS DIMEO TAKES TO ADDRESS RISKS

To strengthen our examination of our operations and supply chains, we engaged independent consultants to help us enhance our existing practices through the incorporation of Modern Slavery considerations. Modern Slavery considerations are now embedded throughout our operations including governance, policies, procedures, employee conduct and supplier engagement.

Governance	Policies & Procedures	Dimeo Employee Code of Conduct	Supply Chain Contract Terms	Supplier Code of Conduct
Modern Slavery Statement considered by Board, half-yearly and full-yearly.	Dimeo Modern Slavery Policy revised & enhanced as standalone policy including remediation.	Dimeo Employee Code of Conduct revised to include Modern Slavery.	Dimeo's 'Corporate Contractor Agreement' revised to include Modern Slavery terms.	Supplier/Contractor Code of Conduct revised to include Modern Slavery.
Dimeo Director appointed as Compliance Officer.	Relevant Dimeo Policies revised to include Modern Slavery, including: <ul style="list-style-type: none"> ✓ Speak Up (Whistleblowing). ✓ Grievance & Complaint. 	Dimeo 'New Employee Starter Pack' revised to include Modern Slavery.	'Corporate Contractor Agreement' forbids Modern Slavery, as defined in Modern Slavery Act 2018 (Cth).	
Ongoing six-monthly reporting to Board on Modern Slavery progress.	Contractor Engagement Policy revised to include Modern Slavery.		'Corporate Contractor Agreement' forbids sub-contracting without Dimeo's written consent.	
'Modern Slavery Risk' added to Dimeo risk management & monitoring processes.	Developed & documented Dimeo's Modern Slavery Statement procedure & process.			

Actions taken to assess & address risks, including due diligence & remediation processes



GRIEVANCE PROCESSES

Dimeo has integrated Modern Slavery into its existing Grievance Policy and procedures, which is publicly available via the Dimeo website. Any employee or stakeholder can report potential Modern Slavery risks in Dimeo's operations or supply chain by contacting the Dimeo Compliance Officer directly or Dimeo's independent, **external mediator phoneline, which we have expanded to specifically include management of concerns relating to Modern Slavery.**

Additionally in FY2019-2020, Dimeo updated its business-wide Speak Up (Whistleblowing) Policy and procedures, in order to promote an environment in which Dimeo employees, Dimeo contractors and the team members of Dimeo contractors, are able to report, without fear of retaliatory action, concerns about any serious instances of wrongdoing that they believe may be occurring, including Modern Slavery. **Importantly, Dimeo's Speak Up Policy applies to our suppliers, contractors and their employees, providing a publicly available, supported mechanism for identification of Modern Slavery risks in our supply chain.**

REMEDIATION PROCESS

Dimeo supports the UN Guiding Principle's approach to remediation of adverse human rights impacts, such as Modern Slavery. Dimeo's Modern Slavery Policy and Grievance Policy detail the remediation process that we follow if an incidence of Modern Slavery is suspected or a concern is reported.

In the situation where Dimeo identifies that we have caused or contributed to Modern Slavery, we are committed to providing for, and cooperating in, the remediation of the impact. Dimeo will work towards remediating the adverse impact by restoring the victim to the situation they would have been in if the adverse impact had not occurred. Concurrently Dimeo will examine our policies, procedures and processes to rectify the anomaly that enabled the situation to occur, and to prevent its recurrence.

Where Dimeo identifies that we are linked to Modern Slavery by a supply chain relationship, we will utilise our leverage, where possible, (either individually and / or in partnership with other stakeholders), to work with the supply chain entity to prevent or mitigate the harm and its recurrence. If this is unsuccessful, Dimeo will end our supply / contract relationship with the entity that caused the impact.

Actions taken to assess & address risks, including due diligence & remediation processes



EMBEDDING - EMPLOYEE TRAINING

Dimeo believe that all our employees have the right to safe and stable employment, and a responsibility to be alert to the potential risks of Modern Slavery in our operations and supply chains. Dimeo helps our employees to be informed about their rights and responsibilities through readily available information and regular training.

All new Dimeo employees are provided with a 'New Starter Pack' which is an easy-to-understand document that includes our Modern Slavery, Speak Up (Whistleblowing) and Grievance & Complaint Policies; Dimeo Code of Conduct; fact sheets from Fair Work Australia; and information about United Voice (the cleaning industry's primary Trade Union). Importantly, Dimeo understands that many of our employees have English as an additional language, so **we welcome and encourage use of formal and informal language interpreters to help our new employees understand the information we provide.** Dimeo also has a strict policy that requires all new employees to participate in a face-to-face induction about the New Starter Pack topics and information prior to starting work. Dimeo is proud to report that in FY2019-2020, 99% of new Dimeo employees participated in induction training, including references to our Modern Slavery Policy.

Existing Dimeo employees also participate in regular compliance training and information sessions relating to company policies, including Modern Slavery. In FY2019-2020, Dimeo implemented company-wide training about our updated Dimeo Modern Slavery Policy for all employees. Frontline employees, supervisors, managers and office-based employees all participated in 'toolbox talk' presentations, with copies of Dimeo's updated Modern Slavery Policy provided to employees and made publicly available via Dimeo's website.

Dimeo's site-specific Work Health & Safety (WHS) Management Plans were also updated to include Dimeo's Modern Slavery Policy, making the Policy physically available at each Dimeo workplace and integrating the Policy into Dimeo's established QMS ISO 9001 certification and compliance systems. Importantly, Dimeo's WHS Site Management Plans are independently audited by ISO annually to ensure consistency and compliance.

Dimeo has now integrated ongoing training about Modern Slavery for Dimeo employees into our company training plans. Modern Slavery training for frontline employees and supervisors continues on a six-monthly basis via face-to-face inductions, and for office-based employees (including our board, executive leaders, human resources, procurement, finance and shared services teams) via annual compliance training.

All Dimeo employee participation in training, including about Modern Slavery, is systematically documented, retained and filed as part of our QMS ISO 9001 compliance requirements.

Actions taken to assess & address risks, including due diligence & remediation processes



EMBEDDING – SUPPLIER EDUCATION

Through the Supplier Engagement process, detailed in Due Diligence above, Dimeo has been able to share with our supply chain a range of informal education about Modern Slavery. Specifically, Dimeo's direct contractors and suppliers were informed about Dimeo's updated Modern Slavery Policy, which includes information about Modern Slavery and the Modern Slavery Act 2018 (Cth).

In FY2020-2021, Dimeo plan to formalise supplier and contractor education, expanding our collaboration with industry initiatives and focussing on our suppliers with which we have the greatest leverage.

EMBEDDING - INDUSTRY COLLABORATION & INITIATIVES

Dimeo has been an advocate for positive change in the Australian cleaning industry for many years. In FY2019-2020, Dimeo continued our collaboration with a range of industry initiatives and stakeholder organisations, ensuring that we remain at the forefront of developments in Modern Slavery risk management in the cleaning industry.

Cleaning Accountability Framework (CAF)	Property Council of Australia (PCA) Modern Slavery Questionnaire	Collaboration with Clients & other Businesses	Supply Chain Sustainability School of Australia
Dimeo was a founding member of CAF. CAF is an independent, multi-stakeholder initiative seeking to improve labour and cleaning standards in Australia.	Dimeo is a PCA Associate Member. PCA key members developed an industry-first online Modern Slavery questionnaire to engage suppliers in Modern Slavery risk management.	Dimeo is an important part of the supply chains of many eminent Australian organisations, including Federal and State / Territory Governments.	Dimeo is a member of the Supply Chain Sustainability School of Australia. Dimeo's appointed Compliance Officer has completed all of the Supply Chain Sustainability School's Modern Slavery e-learning modules.
In 2019 Dimeo became one of the first cleaning companies in Australia to receive a CAF 3 Star Certification (highest level, at the time) for its operations in partnership with CBRE and Charter Hall at 333 George St, Sydney.	Dimeo provided feedback on the initial version of PCA's Modern Slavery Questionnaire. Dimeo was one of the first companies to complete and submit the PCA Modern Slavery Questionnaire in its entirety.	Dimeo collaborates with and actively participates in training, initiatives, information sharing, and auditing processes instigated by our clients who are conducting their own Modern Slavery due diligence of supply chains.	Dimeo plans to roll out e-learning training to Dimeo senior management in FY2020-2021, based on this model.

How we assess effectiveness of actions we take to assess & address Modern Slavery risks



As an integral part of our continuous improvement journey, Dimeo places great importance on ensuring the effectiveness of the actions we take to assess and address Modern Slavery risks in our operations and supply chains.

INTERNAL MONITORING & REPORTING

Dimeo has elevated Modern Slavery risk monitoring and reporting to the highest levels of our organisation. Modern Slavery Risk has been formally added to Dimeo's integrated risk management and monitoring processes. This is managed by the Dimeo executive leadership team, with oversight and ultimate responsibility resting with our Board of Directors.

Dimeo's Board monitors the progress of our Modern Slavery actions at least six-monthly, via consideration of our Modern Slavery Statement half-yearly, and approval of our Modern Slavery Statement at full year.

To further strengthen our internal monitoring and reporting processes, Dimeo's appointed Compliance Officer who is responsible for grievances, complaints and Speak Up (Whistleblowing), including in relation to Modern Slavery, is also a Director of the company.

EXTERNAL REPORTING

Dimeo is pleased to be part of the historic, inaugural year of reporting under the Commonwealth's *Modern Slavery Act 2018* and having our Statement in [Australian Border Force's Online Register of Modern Slavery Statements](#) where it is publicly available for all stakeholders to view and consider.

Our Modern Slavery Statement is also publicly available via our [Dimeo website](#). In FY2019-2020, we had planned to refresh our Dimeo website and introduce a dedicated section for Modern Slavery reporting and information, so that our employees, suppliers, contractors, clients and broader stakeholders could easily examine the progress and effectiveness of Dimeo's Modern Slavery actions. Unfortunately due to the disruption caused by COVID-19, we were unable to refresh our website and plans are now in place for this activity to take place in FY2020-2021.

AUDITING & COMPLIANCE

Dimeo is proud to hold certifications in Quality Management System ISO9001, Environment Management System ISO14001 and Occupational Health & Safety AS/NZS 4801 Standards. By integrating Modern Slavery risk management elements into Dimeo's operational systems, we have also embedded them into our ISO certification and compliance requirements. Importantly, Dimeo's operations, including Modern Slavery actions, will continue to be independently audited annually to ensure we maintain the highest possible level of compliance with ISO and Australian standards.

Dimeo is an important part of the supply chains of many large and eminent Australian organisations that are themselves required to report under the Commonwealth's *Modern Slavery Act 2018*. Following discussions with our major clients, we anticipate that in FY2020-2021, Dimeo will undergo client-led independent auditing of our approach to eliminating Modern Slavery risks in our operations. We look forward to fully participating in these audit processes, to help us further assess the effectiveness of the actions that we are taking to address Modern Slavery risks.

6. Consultation with entities Dimeo owns or controls



As detailed in Section 1, Dimeo Group Holdings Pty Ltd, trading as Dimeo Cleaning Services, as the Modern Slavery Statement reporting entity, is associated with several other entities that it owns and controls. These associated entities exist to manage a national payroll with varying awards and enterprise bargaining agreements and for administrative purposes. All Dimeo entities adhere to the same organisation-wide policies and procedures set by Dimeo Cleaning Services, including the Dimeo Modern Slavery Policy.

Consultation across all the entities that Dimeo Group Holdings owns, and controls occurs via a consistent Executive Director who is a responsible person for all Dimeo's related entities. The Executive Director participates extensively in the Modern Slavery statement processes and, as such, Dimeo is satisfied that the Modern Slavery risks relating to its entities have been and will continue to be appropriately identified, assessed and addressed where necessary.



7. Other relevant information



NEXT STEPS IN DIMEO'S MODERN SLAVERY JOURNEY

In FY2019-2020, Dimeo made significant progress in our approach to eliminating Modern Slavery risks in our operations and supply chains. Our efforts were focused on enhancing our operational and supply chain practices through the incorporation and embedding of Modern Slavery considerations.

The disruption caused by COVID-19 meant we were unable to extend our risk assessment and due diligence processes to all our Tier 1 and our key Tier 2 suppliers of products and services, as we had planned. Plans are now in place for these activities to occur in FY2020-2021, and progress will be reported in our FY2020-2021 Modern Slavery Statement.

With focus on continuous improvement, FY2020-2021 will see Dimeo further embed and strengthen our approach to Modern Slavery, including:

- ✓ Ongoing monitoring, reporting and process improvement.
- ✓ Identifying potential risks of Modern Slavery practices in our key Tier 2 suppliers.
- ✓ Extending the Dimeo Modern Slavery Questionnaire to all Tier 1 and our key Tier 2 suppliers.
- ✓ Training of Dimeo senior management in the Supply Chain Sustainability School's Modern Slavery e-learning modules, or equivalent.
- ✓ Refreshing our Dimeo website and introduce a dedicated section for Modern Slavery reporting and information.
- ✓ Participating in client-led independent audits of our approach to eliminating Modern Slavery risks in our operations, where required.



DIMEO
CLEANING EXCELLENCE

Dimeo Cleaning Services

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